



# E-vergent Wireless

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9-16-2010

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: TV White Spaces  
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, E-Vergent Wireless, provides fixed wireless broadband service in SE Wisconsin and NE Illinois. We operate in 7 Counties across both States from 62 tower sites. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no or very few broadband choices. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's past initiatives, consumers in our service area can now have some broadband service choices.

E-Vergent Wireless is very interested in utilizing television white spaces so that we can expand, and improve service. Spectrum congestion, trees/hills, the general lack of towers, and the high cost of adding additional equipment to existing tower sites are major hurdles that most small WISPs are currently struggling with. Having identified some of our issues we believe that tv white spaces spectrum availability would allow us to continue to serve the best interests of our service markets and we are committed to deploying affordable broadband services as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

Thank You for taking the time to consider our position on this issue and the impact that it will have on our companies as we strive to provide reasonably priced and high quality Broadband Internet Services to our underserved and un-served

Sincerely,

Michael Falaschi  
Member E-Vergent.com LLC